

EXHIBIT A



Attorneys at Law

DAMON A. VESPI, NJ
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July 20, 2022

Via Email

Mary Jane Dobbs, Esq.
Bressler Amery & Ross
325 Columbia Turnpike
Florham Park, N.J. 07932

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2001 UD Highway 46, Suite 502
Parsippany, N.J. 07054

James P. Ricciardi, Jr. Esq.
Fleischner Potash, LLP
1301 Highway 36
Hazlet, N.J. 07730

**Re: Serafin v. Schneider, et al.
Civil Action No. 2:21-cv-20429**

Dear Counsel,

Attached please find Plaintiff's Rule 26(A) Initial Disclosures and formal demand breakdown.

Thank you.

Very truly yours,
/s/ Damon A. Vespi
DAMON A. VESPI

DAV:jmk
Enc.
Cc: Christopher Maruca, Esq.

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NEW YORK, NEW YORK 10020

PLEASE REPLY TO TOTOWA

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RONALD K. SERAFIN,

Plaintiff(s),

vs.

THOMAS D. BROWN, SCHNEIDER
NATIONAL CARRIERS, INC., ALLEN R.
ENGLISH, ENGLISH TRUCKING, HERITAGE
MOTOR FREIGHT, INC., CALDER J.
GLASEBROOK

Defendant(s).

Civil Action No. 2:21-cv-20429- ES-CLW

PLAINTIFF'S RULE 26(A) INITIAL DISCLOSURES

Plaintiff Ronald Serafin serves these initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Plaintiff reserves his right to supplement these Initial Disclosures. By identifying certain individuals and categories of documents, Plaintiff does not waive, or intend to waive, but on the contrary, preserve and intend to preserve, all information and documents that are subject to the attorney-client privilege, the work product doctrine, and any other privilege available under federal or state statutory, constitutional, or common law.

1. **The name and, if known, the address and telephone number of each individual likely to have discoverable information that Plaintiff may use to support their claims and defenses.**

RESPONSE:

- a. Ronald Serafin
Contact Information:
32 Major Street
Clifton, N.J. 07013
Subject of Information: Plaintiff
- b. Carla Loaiza, PT, DPT
Contact Information:
AllCare Health Associates

458 Union Boulevard
Totowa, N.J. 07512
Subject of Information: Treating Doctor

- c. Joshua Rovner, M.D.
Contact Information:
Progressive Spine & Orthopaedics
440 Curry Avenue, Suite A
Englewood, N.J. 07631
Subject of Information: Treating Doctor
- d. Deepan Patel, M.D./Neil Sinha, M.D.
Contact Information:
Garden State Pain Control Center
1117 Route 46 East, Suite 301
Clifton, N.J. 07013
Subject of Information: Treating Doctor
- e. Paramus MRI
Contact Information:
30 West Century Road, Suite 100
Paramus, N.J. 07652
Subject of Information: Diagnostic Testing
- f. McBride Imaging
Contact Information:
1167 McBride Avenue, Suite 3
Woodland Park, N.J. 07424
Subject of Information: Diagnostic Testing
- g. New Jersey Imaging Network - Clifton
Contact Information:
1339 Broad Street
Clifton, N.J. 07013
Subject of Information: Diagnostic Testing
- h. Redi Diagnostics Corp
Contact Information:
One Broadway
Elmwood Park, N.J. 07407
Subject of Information: Diagnostic Testing
- i. Thomas D. Brown/Schneider National Carriers, Inc.
Contact Information: c/o Bressler, Amery & Ross, P.C.
Subject of Information: Defendants

- j. Allen R. English/English Trucking/Heritage Motor Freight, Inc.
Contact Information: c/o Fleischner Potash, LLP
Subject of Information: Defendants
- k. Calder Glasbrook
Contact Information: c/o Kiernan Trebach, LLP
Subject of Information: Defendant

2. **A copy, or description by category and location, of all documents, electronically stored information, and tangible things in Plaintiff's possession, custody, or control it may use to support their claims or defenses.**

RESPONSE:

- a) See attached Traffic Crash Report and Narrative
- b) See attached diagnostic reports from Redi Diagnostics Corp (MRI cervical/lumbar spine 1/28/20), Paramus MRI (right shoulder, left shoulder, right knee, left knee 5/21/20), Garden State Pain Control Center (EMG/NCS Test 2/11/20), Paramus MRI (lumbar spine 1/5/21, cervical spine 9/9/21)
- c) See attached operative reports of Garden State Pain Control (6/4/20, 6/11/20, 6/18/20, 6/25/20, 5/19/22, 5/26/22), Clifton Surgery Center (2/28/20, 3/13/20, 6/8/20, 7/10/20, 7/15/20, 6/16/21, 2/28/22, 4/8/22, 5/11/22), Hudson Regional Hospital (9/9/20, 1/29/21, 11/17/21);
- d) See attached medical bills.

3. **A computation of each category of damages claimed by Plaintiff's.**

RESPONSE:

Plaintiff seeks damages in the following categories: (a) pain and suffering, medical bills and other expenses, (b) interest, and (c) such other relief the Court deems equitable and fair. **\$8.835 Million**

4. **Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment or to indemnify or reimburse for payments made to satisfy the judgment.**

RESPONSE:

Unknown.

5. **The identity of any witness who may be used at trial to present evidence under Federal Rule of Evidence 702, 703, or 705.**

RESPONSE:

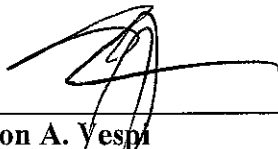
All medical care providers listed in number 1 may be called as witnesses at the time. Additionally, any liability experts that provide a report, may also be called as witnesses at the time of trial. Plaintiff reserves the right to timely supplement this disclosure should such experts be retained in the future.

* * *

Plaintiff specifically reserves the right to amend, modify, alter, supplement, and/or otherwise change the disclosures herein prior to trial of any case. These disclosures are made without any waiver of rights and defenses.

THE VESPI LAW FIRM, LLC

BY:



Damon A. Vespi
547 Union Blvd.
Totowa, NJ 07512
973-634-0292
Attorneys for Plaintiff

Dated: July 20, 2022

EXHIBIT B

April 12, 2023

The Vespi Law Firm, LLC
361 Union Boulevard
Totowa, NJ 07512

Patient: Ronald Serafin
DOB: 09/24/1984
DOA: 12/18/2019

SUPPLEMENTAL NARRATIVE REPORT

Dear Mr. Damon A. Vespi, Esq:

The following is a supplemental narrative report on my narrative report, dated 03/17/23, for my patient, Ronald Serafin, and my opinion since I saw him last on June 6, 2022.

Due to continued pain and objective findings, Mr. Serafin followed-up with Dr. Neil Sinha, his pain management physician, and recently had been the recipient of epidural injection and underwent the implementation of a trial spinal cord stimulator. Patient responded favorably to the trial. He was then referred to a psychiatrist for evaluation and had completed his physiological profile. Following this, Mr. Serafin is now scheduled for the implantation of the permanent spinal cord stimulator on May 1, 2023. I will be doing the implant procedure with Dr. Sinha.

Patient still has ongoing medical treatment. Once he had some time to recover from the spinal cord stimulator implant, I will see the patient for a post operative re-evaluation for a final opinion as to the degree of permanency of his injuries.

My narrative report of 03/17/23 remains unchanged and injuries stated therein are permanent in nature.

Sincerely,

Joshua S. Rovner, M.D.

JSR/ln